GIBSON, DUNN & CRUTCHER LLP GIBSON, DUNN & CRUTCHER LLP 1 Orin Snyder (pro hac vice) Joshua S. Lipshutz (SBN 242557) 2 jlipshutz@gibsondunn.com osnyder@gibsondunn.com 200 Park Avenue 1050 Connecticut Avenue, N.W. 3 New York, NY 10166-0193 Washington, DC 20036-5306 4 Telephone: 212.351.4000 Telephone: 202.955.8500 Facsimile: 212.351.4035 Facsimile: 202.467.0539 5 Kristin A. Linsley (SBN 154148) Deborah Stein (SBN 224570) 6 klinsley@gibsondunn.com dstein@gibsondunn.com Martie Kutscher (SBN 302650) 333 South Grand Avenue 7 mkutscherclark@gibsondunn.com Los Angeles, CA 90071-3197 555 Mission Street, Suite 3000 Telephone: 213.229.7164 8 San Francisco, CA 94105-0921 Facsimile: 213.229.6164 9 Telephone: 415.393.8200 Facsimile: 415.393.8306 10 Attorneys for Defendant Facebook, Inc. 11 12 UNITED STATES DISTRICT COURT NORTHERN DISTRICT OF CALIFORNIA 13 SAN FRANCISCO DIVISION 14 15 IN RE: FACEBOOK, INC. CONSUMER CASE NO. 3:18-MD-02843-VC 16 PRIVACY USER PROFILE LITIGATION, [PROPOSED] ORDER GRANTING 17 FACEBOOK'S ADMINISTRATIVE This document relates to: 18 MOTION TO PERMANENTLY SEAL **CONFIDENTIAL MATERIALS** 19 **ALL ACTIONS** 20 21 22 23 24 25 26 27 28

Gibson, Dunn & Crutcher LLP

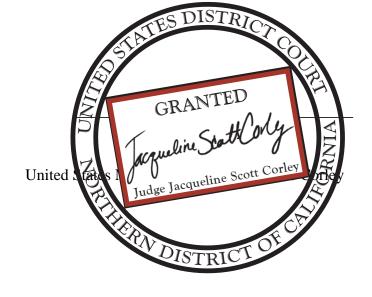
[PROPOSED] ORDER

The Court has considered Facebook, Inc.'s Administrative Motion to Permanently Seal Confidential Materials ("Facebook's Motion") from the parties' search string submissions and the evidence and argument offered in support of Facebook's Motion. Good cause having been shown, Facebook, Inc.'s Administrative Motion to File Under Seal is GRANTED. The Court hereby ORDERS:

- 1. On October 16, 2020, Facebook temporarily filed under seal, as Dkt. 544, Facebook's Request to Approve Facebook's Search String Proposal for Custodian Groups 1-4 ("Facebook Brief"). Exhibit 1 to the Declaration of Martie Kutscher In Support Of Facebook's Administrative Motion to Permanently Seal Confidential Materials, which is a redacted version of the Facebook Brief, shall replace Dkt. 544 on the docket.
- 2. On October 16, 2020, Facebook temporarily filed under seal unredacted versions of Exhibits A, B, and C to the Declaration of Martie Kutscher in support of the Facebook Brief. Dkts. 543-3 to 543-5. These exhibits shall be permanently sealed.
- 3. On October 16, 2020, Plaintiffs temporarily filed under seal, as Dkt. 545-2, Plaintiffs' Submission Regarding Disputed Search Strings and Exhibits A to O thereto ("Plaintiffs' Submission"). Exhibit 2 to the Declaration of Martie Kutscher In Support Of Facebook's Administrative Motion to Permanently Seal Confidential Materials, which is a redacted version of Plaintiffs' Submission, shall replace Dkt. 545-2 on the docket.
- 4. Exhibits 3 and 4 to the Declaration of Martie Kutscher In Support Of Facebook's Administrative Motion to Permanently Seal Confidential Materials, which are unredacted versions of #1 and #3 above, shall be sealed permanently.

IT IS SO ORDERED.

DATE: March 15, 2021



Gibson, Dunn & Crutcher LLP